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20 WELLS FARGO BANK, N.A.

13                   **UNITED STATES DISTRICT COURT**  
14                   **NORTHERN DISTRICT OF CALIFORNIA**  
15                   **SAN FRANCISCO DIVISION**

16 ALICIA HERNANDEZ, *et al.*, individually  
17 and on behalf of all others similarly situated,

18                   No. 3:18-cv-07354 WHA

19                   Plaintiffs,

20                   v.

21                   WELLS FARGO BANK, N.A.,

22                   Defendant.

23                   **STIPULATED ADMINISTRATIVE MOTION**  
24                   **FOR ENTRY OF AN AMENDED**  
25                   **PROTECTIVE ORDER PURSUANT TO L.R.**  
26                   **7-11 AND 7-12**

**STIPULATED ADMINISTRATIVE MOTION FOR ENTRY OF  
AN AMENDED PROTECTIVE ORDER PURSUANT TO L.R. 7-11 AND 7-12**

Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) respectfully requests, with Plaintiffs’ consent, that the Court enter an Amended Stipulated Protective Order (“Amended Protective Order”) in the form attached as Exhibit 1 hereto. The Court previously entered a Stipulated Protective Order in this matter. (Dkt. Nos. 66 and 69.) The only difference between that order and the proposed Amended Protective Order is that the latter allows the parties to use an “Attorney’s Eyes Only” designation for documents that contain personal identifying information of unnamed class members (now that the Court has certified a class), limiting the disclosure of unnamed class members’ personal identifying information to only the parties’ outside counsel and their experts in this litigation. The Amended Protective Order is necessary to facilitate the exchange of the unnamed class members’ loan files before trial begins on May 11, 2020. A redlined document showing the differences between the two orders is attached as Exhibit 2.

The parties respectfully request that the Court enter the proposed Amended Protective Order.

Dated: March 5, 2020

## WINSTON & STRAWN LLP

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